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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

MARDI ROMANO,

Plaintiff,

v.

TRANS UNION, LLC, JPMORGAN CHASE  
BANK, NA, CREDIT COLLECTION  
SERVICES, INC., and CREDIT CONTROL  
SERVICES, INC.,

Defendants.

Case No. 2:21-cv-001150-JCM-EJY

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT (FIRST REQUEST)**

Plaintiff Mardi Romano ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, files this Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

1. On June 17, 2021, Plaintiff filed her Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is August 10, 2021. Trans Union requests a twenty-eight (28) day extension of that deadline, up to and including September 7, 2021.

2. The allegations in Plaintiff's Complaint date back to September 2018 and relate to a Chase account allegedly reporting on Plaintiff's credit file. Trans Union needs additional time to locate and assemble documents relating to Plaintiff's credit file, any disputes submitted

1 by Plaintiff, and Trans Union's reinvestigation of any such disputes. In addition, Trans Union's  
2 counsel will need additional time to review and analyze Trans Union's documents so that it may  
3 respond to the specific allegations contained in Plaintiff's Complaint. Moreover, the parties will  
4 actively discuss a potential early resolution of this case, and the parties believe an extension of  
5 this nature may save waste of the parties' time and expense. The additional time will allow  
6 Plaintiff and Trans Union time to fully explore such early settlement discussions.

7 3. On August 9, 2021, counsel for Trans Union communicated with Plaintiff's  
8 counsel regarding an extension within which to file a response to the Complaint, and Plaintiff's  
9 counsel agreed to the extension.

10 4. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
11 otherwise respond to Plaintiff's Complaint up to and including September 7, 2021. This is the  
12 first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

13 Dated this 10th day of August 2021.

14 **QUILLING SELANDER LOWNDS**  
15 **WINSLETT & MOSER, P.C.**

16 /s/ Jennifer Bergh

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**FREEDOM LAW FIRM AND KIND LAW**

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***Counsel for Plaintiff***

**ORDER**

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated this 11th day of August, 2021.

  
UNITED STATES MAGISTRATE JUDGE